



THE CITY OF NEW YORK
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September 24, 2021

By ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Huggins v. City of New York, et al.
21-cv-1533 (PKC)

Your Honor:

I am the attorney assigned to represent defendant the City of New York in the above-referenced case. The City writes, on behalf of both parties, to request that the Court adjourn all deadlines in this case sine die for the reasons set forth herein.

A case management plan was endorsed by the Court in this case on July 30, 2021, setting several interim discovery deadlines as well ordering that fact discovery be complete by January 21, 2021. After several failed attempts to contact plaintiff's counsel to adjourn the parties' scheduled mediation, which was set for September 20, 2021, plaintiff's counsel finally informed defendant that he is currently very ill and undergoing medical treatment, and is unable to fully participate in the case at this time. He also advised defendants that he is too ill to write to the Court himself. Given this unfortunate update from plaintiff's counsel, the parties will not be in a position to proceed with discovery at this time and to comply with the existing schedule set by the Court.

The parties therefore respectfully request an adjournment of all discovery deadlines sine die, and propose that the parties submit a status letter to the Court within 60 days, or by November 24, 2021. The parties will propose a new discovery schedule at that time. Upon information and belief, plaintiff's counsel expects to be able to participate in the litigation further in November.

*All proceedings
stayed through November 24,
2021 and further order
of the Court.
SO ORDERED
[Signature]
USDJ
9-24-21*

Thank you for your consideration herein.

Respectfully submitted,

/s/ *Katherine J. Weall*

Katherine J. Weall
Senior Counsel

c.c. Philip Akakwam
Attorney for Plaintiff